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IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

STATE OF IDAHO **Plaintiff,** **V.** **BRYAN C. KOHBERGER,** **Defendant.**	**CASE NUMBER CR01-24-31665** **NOTICE OF FILING LIST OF STIPULATED EXHIBITS FOR MOTIONS TO SUPPRESS AND MOTION FOR FRANKS' HEARING**

COMES NOW, Bryan C. Kohberger, by and through his attorneys of record, and with stipulation of the State, hereby files lists of all exhibits admitted by stipulation during the various

Motions to Suppress and Motion for Franks Hearing held on January 23 and 24, 2025.

DATED this ___29th____ day of January, 2025.

No objection per email 1/29/25

ASHLEY JENNINGS
SENIOR DEPUTY PROSECUTOR

ANNE C. TAYLOR
ANNE TAYLOR LAW, PLLC

CERTIFICATE OF DELIVERY

I hereby certify that a true and correct copy of the foregoing was personally served as indicated below on the __29____ day of January, 2025 addressed to:

Latah County Prosecuting Attorney –via Email: paservice@latahcountyid.gov

Elisa Massoth – via Email: legalassistant@kmrs.net

Jay Logsdon – via Email: Jay.Logsdon@spd.idaho.gov

Jeffery Nye, Deputy Attorney General – via Email: Jeff.nye@ag.idaho.gov

Motion for a Franks Hearing

EXHIBIT #	Description	Pleading
Defendant's Exhibit D1	Email Communications BETWEEN Detective Payne, FBI Agent Ballancve, and Latah County Prosecutor's Office	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D1 - B	Email with additional PC Attachment from FBI Agent Nicholas Balance to Brett Payne	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D1 - C	Email with working draft for search warrant for AT&T from Brett Payne to FBI Agent Nicholas Balance	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D2	Exhibit A Statement of Dustin Blaker Affidavit presented to a Judge in Washington	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D3 - A	Affidavit for Search Warrant to Google 1.3.23 warrant	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D3 - B	Affidavit in Support of Arrest	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D4 - A	Transcript – 5.23.24 Motion to Compel 2:38p.m.	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D4 - B	Transcript - – 5.30.24 Motion to Compel 10:00a.m.	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D5	CAST Report – Draft	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D6	CAST Report	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D7 - A	Affidavit of Tom Slovinski	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D7 - B	Affidavit of Sy Ray	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D8 - A	Officer Nunes Transcript and Summary	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D8 - B	Detective Mowery Transcript and Summary	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D8 - C	Detective Gooch Transcript and summary	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D9	Emails with Vehicle Identification Expert	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D10	Affidavit in support of Search Warrant - UPS	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D11	Payne's IM Communications	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D12	BOLO	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D13	Supplemental Report 52 by Brett Payne Re Test Runs	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D14 - A	SEALED Transcript of Grand Jury Hearing 5.15.23	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D14 - B	SEALED Transcript of Grand Jury Hearing 5.16.23	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D15 - A	Supplemental Report 152 by Officer Gunderson Re Dog	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D15 - B	Screen clip from Officer Nunes bodycam video of the dog upon arrival	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D16	Return on Warrant	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D17	AT&T Records Provided Pursuant to Search Warrant	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D18	Cellebrite Report	Defendant's Memorandum in Support for a Franks Hearing

Defendant's Exhibit D19	Department of Justice Interim Policy	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D20	Letter from Latah County Proswecuting Attorney dated 6/24/24 to Othram regarding databases searched	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D21	Transcript from Motion to Compel Hearing on 5/30/24	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D22	Shoeprint outside of Dylan Mortensen's room	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D23	Transcript of AV00088 file - Mortensen interview 12/30/22	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D24	Order on Defendant's 4th and 5th Motions to Compel Discovery (unredeacted)	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit - A	Lab Report 28	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D25 - B	Lab Report 29	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D25 - C	Lab Report 30	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D26	Sealed Letters between Latah County Prosecuting Attorney's Office and FBI	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D27	Sealed Letter dated 11/28/23 from FBI to Latah County Prosecuting Attorney	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D28	Skivubsju CV; Ray CV	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D29	Sy Ray Cases	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D30	Mesaging with Payne	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D31	Lab Report 1/27/23 FBI Fibers hair - no connection	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D32	Lab Report 2/28/23 FBI Fiber/hair no connection	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D33	Biology Analysis notes, Photos, Neg Blood	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D34	DNA 1/23/23	Defendant's Memorandum in Support for a Franks Hearing
Defendant's Exhibit D35	ISP Forensics	Defendant's Memorandum in Support for a Franks Hearing
State's Exhibit S-1	Interview with Dylan Mortensen 11/17/22	State's Objection to Defendant's Amended Motion for Franks Hearing
State's Exhibit S-2	Interview with Dylan Mortensen 12/1/22	State's Objection to Defendant's Amended Motion for Franks Hearing
State's Exhibit S-3	FBI SA Hille Report regarding video surveillance	State's Objection to Defendant's Amended Motion for Franks Hearing
State's Exhibit S-4	Screenshot from Mitch Nunes body camera on 11/13/22 at 12:04:55	State's Objection to Defendant's Amended Motion for Franks Hearing
State's Exhibit S-5	ISP Forensic Biology Report 33 dated 5/23/23	State's Objection to Defendant's Amended Motion for Franks Hearing

Motion to Suppress Re: Genetic Inforamation

EXHIBIT #	DESCRIPTION	Pleading
Defendant's Exhibit 1	Email between Gammett and Mooney Re Contact for FBI Genology	Defendant's Memo in Support of Motion to Suppress Genetic Info
Defendant's Exhibit A	Arizona V. Mitcham Opinion from Court of Appeals	Reply to State's Objection to Motion to Suppress- Genetic Information
Defendant's Exhibit 26	Sealed Letters between Latah County Prosecuting Attorney's Office and FBI	Defendant's Memorandum in Support for a Franks Hearing but utilized in Motion to Suppress IGG
Defendant's Exhibit D19	Department of Justice Interim Policy	Defendant's Memorandum in Support for a Franks Hearing but utilized in Motion to Suppress IGG
State's Exhibit S-1	*Colorado v. Phillips* , Order Denying Motion to Supress Familial DNA Serach and Fruit Thereof	State's Objection to Defendant's Motion to Suppress Re: Genetic Information

Motion to Suppress Re: AT&T First Warrant

EXHIBIT #	DESCRIPTION	Pleading
Defendant's Exhibit A *(Court entered this as Exhibit S-2.1)*	Return of Warrant Receipt and Inventory and Order	Reply to State's Objection to Defendant's Motion to Suppress and Memorandum in Support Re: AT&T First Warrant
State's Exhibit S-1	Affidavit for Search Warrant Re: AT&T (first warrant)	State's Objection to Defense Motion to Suppress re: AT&T First Warrant
State's Exhibit S-2	Search Warrant Re: AT&T (first warrant) dated 12/23/22	State's Objection to Defense Motion to Suppress re: AT&T First Warrant

Motion to Suppress Re: Pen Trap and Trace

EXHIBIT #	DESCRIPTION	Pleading attached to
Defendant's Exhibit A *(Court entered this as exhibit S2.1)*	Return of Search Warrant, Affidavit, Receipt & Inventory, and Order	Reply to State's Objection to Defendant's Motion to Suppress and Memorandum in Support re: Pen Trap and Trace Device
Defendant's Exhibit B	12.23.22 Trap and Trace Warrant 509-592-8458 - Ballance	Reply to State's Objection to Defendant's Motion to Suppress and Memorandum in Support re: Pen Trap and Trace Device
Defendant's Exhibit C *(Court entered this as exhibit 2.3)*	Exhibit C AT&T form with warrant	Reply to State's Objection to Defendant's Motion to Suppress and Memorandum in Support re: Pen Trap and Trace Device
State Exhibit S-1	Affidavit for Search Warrant and Application for an Order for a Pen register or a Trap and Trace Device	State's objection to Defendant's Motion to Suppress and Memorandum in Support RE: Pen Trap and Trace Device
State Exhibit S-2	Search Warrant and Order for a Pen Register or a Trap and Trace Device and Non-Disclosure Order pursuant to I.C. 18-6722	State's objection to Defendant's Motion to Suppress and Memorandum in Support RE: Pen Trap and Trace Device

Motion to Suppress Pennsylvania Search Warrant for Lamsden Dr., Albrightsville, PA and Statements Made		
EXHIBIT #	**DESCRIPTION**	**Pleading**
Defendant's Exhibit A	Search Warrant for 119 Lamsden	Motion to Suppress and Memorandum in Support re: Pennsylvania Search Warrant for 119 Lamsden Dr., Albrightsville, PA and statements made
Defendant's Exhibit B	Attest Warrant and Affidavit for Arrest Warrant 12/29/22	Motion to Suppress and Memorandum in Support re: Pennsylvania Search Warrant for 119 Lamsden Dr., Albrightsville, PA and statements made
State's Exhibit S-1	Pennsylvania State Police Report (Initial Narrative)	State's Objection to Defendant's Motion to Suppress and Memorandum in Support re: Pennsylvania Search Warrant for 119 Lamsden Drive, Albrightsville, PA and Statements Made
State's Exhibit S-2	Pennsylvania State Police Report - General Offense Report	State's Objection to Defendant's Motion to Suppress and Memorandum in Support re: Pennsylvania Search Warrant for 119 Lamsden Drive, Albrightsville, PA and Statements Made
State's Exhibit S-3	Pennsylvania State Police Report - General Offense Report - PSP Special Emergency Response Team Event Log	State's Objection to Defendant's Motion to Suppress and Memorandum in Support re: Pennsylvania Search Warrant for 119 Lamsden Drive, Albrightsville, PA and Statements Made
State's Exhibit S-4	Application for Search Warrant	State's Objection to Defendant's Motion to Suppress and Memorandum in Support re: Pennsylvania Search Warrant for 119 Lamsden Drive, Albrightsville, PA and Statements Made
State's Exhibit S-5	Letter to Detective Payne from Pennsylvania State Police - Sgt. Michael Lang	State's Objection to Defendant's Motion to Suppress and Memorandum in Support re: Pennsylvania Search Warrant for 119 Lamsden Drive, Albrightsville, PA and Statements Made
State's Exhibit S-6	Pennsylvania State Police Report - General Offense Report regarding custody of Bryan Kohberger	State's Objection to Defendant's Motion to Suppress and Memorandum in Support re: Pennsylvania Search Warrant for 119 Lamsden Drive, Albrightsville, PA and Statements Made

Motion to Suppress re: Search Warrant for Mr. Kohberger's Person		
EXHIBIT #	**DESCRIPTION**	**Pleading**
State's Exhibit S-1	Affidavit for Search Warrant for Bryan Kohberger's Person	State's Objection to Defendant's Motion to Suppress and Memorandum in Support re: search warrant for Mr. Kohberger's person
State's Exhibit S-2	Search Warrant Dated 1/5/23 Re: Bryan Kohberger's Person	State's Objection to Defendant's Motion to Suppress and Memorandum in Support re: search warrant for Mr. Kohberger's person

Motion to Suppress re: Search Warrant for Defendant's Apartment		
EXHIBIT #	**DESCRIPTION**	**Pleading**
Defendant's Exhibit A	Application for Search Warrant; Motion and Order to Un-sweal Return; Motion to Transfer Custody of Items; Motions and Orders to Seal; Search Warrant Return;	Motion to Suppress and Memo in Support re: Search Warrant for Defendant's Apartment
State's Exhibit S-1	Redacted Search Warrant for Residence (Washington)	State's Objection to Defendant's Motion to Suppress and Memo in Support re: Search Warrant for Defendant's Apartment
State's Exhibit S-2	Amended Statement by Dawn Daniels, WSU Police Regarding Search for Residence (Washington)	State's Objection to Defendant's Motion to Suppress and Memo in Support re: Search Warrant for Defendant's Apartment

Motion to Suppress Re: Cell Phone/USB Moscow Police Forensic Lab

EXHIBIT #	Description	Pleading
Defendant's Exhibit A	Affidavit for Search Warrant and Search Warrant, dated 1/9/2023.	Defendant's Motion to Suppress Cell Phone/USB File and memorandum in Support re: Moscow Police Forensic Lab Warrant Dated January 9, 2023

Motion to Suppress and Memo in Support RE: Apple Account Federal Grand Jury Subpoena and Search warrant dated August 1, 2023

EXHIBIT #	DESCRIPTION	Pleading
Defendan't Exhibit A	Apple - Preservation Letter, 12/21/2022.	Apple Motion to Suppress and Memo in Support RE: Apple Account Federal Grand Jury Subpoena and Search warrant dated August 1, 2023
Defendant's Exhibit B	Apple – Subpoena Certification, 1/12/2023.	Apple Motion to Suppress and Memo in Support RE: Apple Account Federal Grand Jury Subpoena and Search warrant dated August 1, 2024
Defendant's Exhibit C	Apple – Email Chane, 4/7/2023 to 4/13/2023.	Apple Motion to Suppress and Memo in Support RE: Apple Account Federal Grand Jury Subpoena and Search warrant dated August 1, 2025
Defendant's Exhibit D	Apple – Affidavit for Search Warrant and Search Warrant, 8/1/2023.	Apple Motion to Suppress and Memo in Support RE: Apple Account Federal Grand Jury Subpoena and Search warrant dated August 1, 2026
Defendant's Exhibit E	Apple – Affidavit, Return of Search Warrant, and Receipt and Inventory, 8/9/2023.	Apple Motion to Suppress and Memo in Support RE: Apple Account Federal Grand Jury Subpoena and Search warrant dated August 1, 2027
State's Exhibit S-1	Affidavit for Search Warrant Re: Apple dated 8/1/23 including Exhibit A (Statement of Officer); and Exhibit B (Receipt for iPad Pro dated 1/5/18(	State's Objection to Defendant's Motion to Suppress and Memo in Support re: Apple Account Federal Grand Jury Subpoena and Search Warrant dated August 1, 2023
State's Exhibit S-2	Search Warrant Re: Apple dated 8/1/23	State's Objection to Defendant's Motion to Suppress and Memo in Support re: Apple Account Federal Grand Jury Subpoena and Search Warrant dated August 1, 2023
State's Exhibit S-3	Order for Return of Warrant dated August 14, 2023	State's Objection to Defendant's Motion to Suppress and Memo in Support re: Apple Account Federal Grand Jury Subpoena and Search Warrant dated August 1, 2023
State's Exhibit S-4	Thumb Drive containing information from Apple	State's Objection to Defendant's Motion to Suppress and Memo in Support re: Apple Account Federal Grand Jury Subpoena and Search Warrant dated August 1, 2023

Motion to Suppress re: Amazon Account Federal Grand Jury Subpoenas and Warrants dated April 26, 2023, and May 9, 2023

EXHIBIT #	DESCRIPTION	Pleading
Defendant's Exhibit A	Amazon – Affidavit for Search Warrant dated 4/26/2023 and Amended Search Warrant dated 5/8/2023.	Motion to Suppress and Memo in support re: Amazon Account Federal Grand Jury Subpoenas and Warrants dated April 26, 2023, and May 9, 2023
State's Exhibit S-1	Search Warrant Re: Amazon dated 3/26/23	State's Objection to Defendant's Motion to Suppress and Memo in support re: Amazon Account Federal Grand Jury Subpoenas and Warrants dated April 26, 2023, and May 9, 2023
State's Exhibit S-2	Amended Search Warrant Re: Amazon dated 5/8/23	State's Objection to Defendant's Motion to Suppress and Memo in support re: Amazon Account Federal Grand Jury Subpoenas and Warrants dated April 26, 2023, and May 9, 2023
State's Exhibit S-3	Affidavit for Search Warrant Re: Amazon (including Exhibit A)	State's Objection to Defendant's Motion to Suppress and Memo in support re: Amazon Account Federal Grand Jury Subpoenas and Warrants dated April 26, 2023, and May 9, 2023
State's Exhibit S-4	Amazon Subscription Information for Bryan Kohberger	State's Objection to Defendant's Motion to Suppress and Memo in support re: Amazon Account Federal Grand Jury Subpoenas and Warrants dated April 26, 2023, and May 9, 2023

Motion to Suppress and Memorandum in Support re: Google Warrants Dated 1-3-23, 1-24-23, and 2-24-23

EXHIBIT	DESCRIPTION	Pleading
A	Google Warrant One, 1/3/2023 – Affidavit for Search Warrant and Search Warrant.	Motion to Suppress and Memorandum in Support re: Google Warrants Dated 1-3-23, 1-24-23, and 2-24-23
B	Google Warrant Two, 1/25/2023 – Affidavit for Search Warrant and Search Warrant.	Motion to Suppress and Memorandum in Support re: Google Warrants Dated 1-3-23, 1-24-23, and 2-24-24
C	Google Warrant Three, 2/24/2023 – Affidavit for Search Warrant and Search Warrant.	Motion to Suppress and Memorandum in Support re: Google Warrants Dated 1-3-23, 1-24-23, and 2-24-25
D	Return for Google Warrant Three, 3/14/2023.	Motion to Suppress and Memorandum in Support re: Google Warrants Dated 1-3-23, 1-24-23, and 2-24-26
E	Receipt and Inventory for Google Warrant Three, 3/14/2023.	Motion to Suppress and Memorandum in Support re: Google Warrants Dated 1-3-23, 1-24-23, and 2-24-27
F	Email between Lawrence Mowery and Google, 1/4/2023.	Motion to Suppress and Memorandum in Support re: Google Warrants Dated 1-3-23, 1-24-23, and 2-24-28